

From: Rubin, Samuel J. <SRubin@goodwinlaw.com>
Sent: Thursday, June 23, 2022 9:40 AM
To: Gary Greenberg <gg@ggreenberglaw.com>
Cc: David Lurie <david@davidlurielaw.com>; Fishman, Marshall H. <MFishman@goodwinlaw.com>; Harrington, William <WHarrington@goodwinlaw.com>; Hoyle, Lindsay E <LHoyle@goodwinlaw.com>
Subject: RE: Ramchandani/Citi

Gary,

We're still reviewing your recent letter, and reserve rights to further respond, but I wanted to respond briefly to a few points in the interest of time:

1. You did not respond to our request to confirm July 15, 2022 for Mr. Ybarra's deposition—please confirm as soon as possible.
2. You've mischaracterized the Court's ruling with regard to Mr. Nelson and we reserve all rights.
3. With regard to the former employees, we do not presently represent either Mr. Forese or Ms. York and are not authorized to accept service, although we reserve rights to represent them should they be properly served with subpoenas in this action. Mr. Forese's last known address is as follows:

James Forese

[REDACTED]
[REDACTED] CT 06840-2200

Ms. York was a United Kingdom based employee whose last known personal address is in the United Kingdom. We are conferring with UK-based counsel to determine whether her last known personal address can be shared in a litigation context such as this consistent with governing privacy regulations. At the same time, given that her deposition would be limited to a maximum of 30 minutes in any case, and that she is a former employee based in the United Kingdom who will require Hague process to serve, please advise if you are insisting on receiving her personal address so we can evaluate any applicable privacy issues.

In all cases, please further note that both the personal addresses of Mr. Forese and Ms. York (if it can be supplied) are designated Confidential under the Governing Protective Order in this action (ECF No. 51).

4. With regard to your purported expert document issues, please identify exactly which document request you believe calls for the production of these materials and identify specifically what about our current document responses, and responses to your interrogatories, is allegedly deficient in order for us to make any meet-and-confer efficient and productive.

Samuel J. Rubin



o +1 212 813 8852